

2013 MID-YEAR PAC/PARTY REPORTING ROUNDTABLE

July 10, 2013

1:00 – 2:30 p.m.

[http://www.fec.gov/info/
roundtable_materials/workshopmaterials.shtml](http://www.fec.gov/info/roundtable_materials/workshopmaterials.shtml)

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Objectives

- ▣ Review filing deadlines and application of “best efforts” for timely filing
- ▣ Learn about the Reports Analysis Division (RAD) review process and how best to respond to a Request for Additional Information (RAI)
- ▣ Discuss common reporting errors

Reporting - Timely Filing Schedule and Reporting Dates (Review)

~~PAC Quarterly~~ Filing 2013

Report Type	Coverage Dates	Due Date
Mid-Year	01/01/13 - 06/30/13	07/31/13
Year-End	07/01/13 - 12/31/13	01/31/14

Semi-annual Reports

A. Quarterly Filing

1. **Committees that file quarterly in election years file on a semi-annual schedule in non-election years.**
2. If a party committee that files quarterly engages in reportable FEA, it must switch to monthly.
3. Reporting period always begins the day after close of books of last report filed.
4. In election years, PACs and Party Committees that file Quarterly should file on January 31, April 15, July 15, October 15, a Pre-General report (if applicable), and a Post-General Report.
5. See *Reports Due in 2013* at <http://www.fec.gov/pages/fecrecord/2013/january/reportsduein2013.shtml>.

PAC Monthly Filing 2013

Reporting Period	Due Date
January 1-31	February 20
February 1-28	March 20
March 1-31	April 20
April 1-30	May 20
May 1-31	June 20
June 1-30	July 20
July 1-31	August 20
August 1-31	September 20
September 1-30	October 20
October 1-31	November 20
November 1-30	December 20
December 1-31 (Year-End)	January 31, 2014

B. Monthly Filing

1. Monthly is mandatory for national party committees or party committees with reportable FEA. 11 CFR 300.36(c). See also *Reports Due in 2013* at <http://www.fec.gov/pages/fecrecord/2013/january/reportsduein2013.shtml>
2. File reports on the 20th of each month.
3. During election year, file Pre- and Post-General election reports in place of November and December monthly reports.
4. Monthly filers must file a Year-End Report on January 31 of each year.
5. Reporting period begins the day after close of books of last report filed.

Special Elections 2013

- ▣ May trigger additional reports for quarterly filers that participate
- ▣ Visit FEC.gov for details:
http://www.fec.gov/info/report_dates.shtml

Choosing a Filing Schedule

Committees active in a number of different states may benefit from filing monthly.

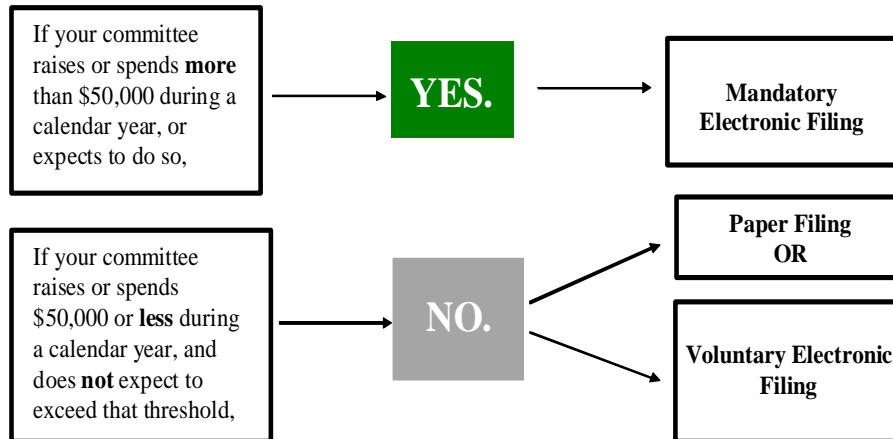
Changing Filing Frequency

- ▶ Request on or before next report
 - Electronic filers must submit request electronically
- ▶ No more than once per year

C. Changing Filing Schedule

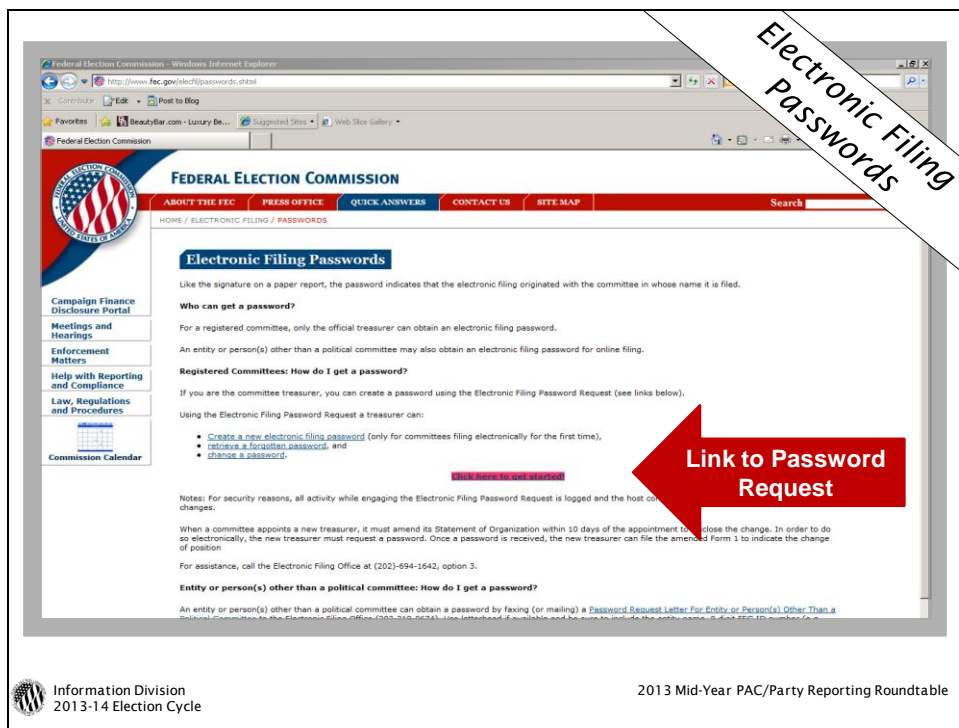
1. PACs and Party Committees may change their filing schedule from quarterly to monthly or from monthly to quarterly only after notifying the Commission in writing (or electronically, if an e-filer) of their intention. The committee can provide this notification along with a required report filed under the committee's current filing schedule or in a separate Miscellaneous Text Submission (Form 99).
2. The committee should wait to receive a letter from the FEC acknowledging its filing frequency change. The committee will then be required to file the next required report under the new filing schedule. However, party committees that engage in reportable federal election activity (FEA) must automatically switch to monthly filing.
3. May only change filing schedule once per calendar year.

Are you required to file electronically?



Electronic Filing





D. Electronic Filing (11 CFR 104.18)

1. **Mandatory for:** PACs that raise or spend more than \$50,000 in calendar year or have reason to expect to do so.
*See *Guide* pp. 49-50 for definition of “reason to expect to exceed the threshold.”
2. **Voluntary for:** All Other PACs
3. **Passwords**
 - a) **Required**
Before you can electronically file your report, you will have to obtain a password. You cannot file without one.
 - b) **Who Can Get a Password?**
Only the treasurer and assistant treasurer(s) listed on the committee’s Statement of Organization can get a password. Assistant treasurer’s password request must be signed by both assistant and the treasurer.
 - c) **How Do You Get a Password?**
 - (1) Most committees may obtain or change their password on-line at <http://www.fec.gov/electfil/passwords.shtml>
 - (2) Others should contact the Electronic Filing Office for assistance
4. **Paper Filing by E-Filer**
Committees that submit a report on paper that should have been filing electronically will be treated as non-filers and may be subject to enforcement actions (including Administrative Fines).
5. **For more information:** <http://www.fec.gov/electfil/electron.shtml>.

Other Filing Considerations

- ▣ No Extensions
 - Filing dates not extended for weekends or holidays.
 - Must be received on business day preceding filing date.
- ▣ Registered/Certified vs. Overnight Mail
 - If filing using USPS registered/certified mail, keep receipt.
 - “Overnight Mail” means next-day express or priority mail with delivery confirmation or overnight service with online tracking system. Same terms as registered/certified mail. (Keep receipt/tracking number.)



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E. Other Filing Considerations

1. **Statute Prohibits Extensions** (Applicable to Paper and Electronic Filers).
2. **Weekends and Holidays**
Filing dates not extended for weekends or holidays. Must be filed on business day preceding filing date.
3. **Registered vs. Overnight Mail**
 - a) If filing using USPS registered mail, keep receipt.
 - b) “Overnight Mail” means next-day express or priority mail with a delivery confirmation or an overnight service with an online tracking system. File using same terms as certified/registered mail. (Keep receipt/tracking number.)

Administrative Fine Program

- ▣ Civil money penalties for filing late, or not filing at all.
- ▣ Size of fine depends on various factors.

F. Administrative Fine Program (AFP)

1. Background

Program for assessing civil money penalties for violations for failure to file reports on time and/or at all.

2. Applies to:

- a) Late filers
- b) Non-filers
- c) Regulations found at 11 CFR 111.30-111.45

3. Civil Money Penalties -- Factors in determining:

The interaction of several factors will determine the size of the penalty (also see calculator on website at http://www.fec.gov/af/af_calc.shtml).

Administrative Fine Program

- ▣ Election-sensitive reports:
 - **Late filer** – filed after due date, but more than four days before the applicable election
 - **Non-filer** – filed later than that or not at all.
- ▣ Non-sensitive reports:
 - **Late filer** – filed ≤ 30 days after the due date
 - **Non-filer** – filed \geq days late or not at all.

a) **Election Sensitivity**

Election sensitive reports include:

- October Quarterly of election year,
- October Monthly of election year, and
- Pre-election reports for primary, general and special elections.

All other reports are considered nonsensitive.

b) **Whether Committee is a Late filer or a Non-filer**

(1) For Sensitive Reports

- (a) Late filer – when report is filed after the due date but more than four (4) days prior to the election.
- (b) Non-filer - report filed after due date and four (4) days or less before the election, or not at all.

(2) For Nonsensitive Reports

- (a) Late filer – when report is filed within 30 days after the due date.
- (b) Non-filer – when report is filed 31 or more days after due date, or not at all.
- (c) Can still be considered a “nonfiler” even if report is eventually filed.

Administrative Fine Program

- ▣ Prior civil money penalties for reporting violations
- ▣ Financial activity in report
- ▣ Smaller penalties for activity < \$50,000
- ▣ Penalty calculator on FEC website at http://www.fec.gov/af/af_calc.shtml

- c) **Prior civil money penalties for reporting violations under the AFP.**
- d) **Financial Activity**
 - (1) Amount of financial activity in the report – total amount of receipts and disbursements.
 - (2) Committees with less than \$50,000 in financial activity during the reporting period in question are subject to reduced penalties under the AFP pursuant to April 2003 revisions to the regulations.
 - (3) July 2009 revisions to the AFP regulations adjusted penalties for inflation.
 - (4) Campaign Finance Analysts will not be able to tell you if you will be fined or how much. You can use the Administrative Fine calculator (http://www.fec.gov/af/af_calc.shtml) to estimate your fine. Your committee will be notified in writing if the FEC assesses a civil penalty against your committee under the AFP.

Best Efforts to File on Time

Best efforts may be used as a defense for late filing if:

- Committee was prevented from filing report on time by reasonably unforeseen circumstances beyond committee's control
- Filed the report no later than 24 hours after the end of those circumstances



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- G. Timely Filing/Using Best Efforts (not the same as “best efforts” for obtaining contributor information)**
- 1. Reports required on time;** no extensions.
 - 2. If report not filed on time,** committees may use “best efforts” defense if committee took normal precautions and trained staff, but failure to report was due to circumstances beyond committee's control and the late report was filed within 24 hours after those circumstances ended (pursuant to April 2007 revisions to AFP regulations).

Best Efforts to File on Time

Committee may use best efforts defense if late filing is due to:

- ❑ Failure of FEC computers/Commission-provided software, despite committee seeking technical assistance from FEC personnel and resources
- ❑ Widespread disruption of information transmissions over internet
- ❑ Severe weather or other disaster-related event



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3. When can best efforts defense be used:

- a) Committee may use best efforts defense if failure to report is due to failure of Commission computers or software, despite receiving Commission technical assistance, widespread disruption of information transmissions over the internet, or severe weather or other disaster-related event.

Best Efforts to File on Time

Committee may **not** use best efforts defense if late filing is due to:

- ▣ Negligence;
- ▣ Illness, inexperience or unavailability of treasurer or committee staff;
- ▣ Committee computer, software or ISP failures;
- ▣ Delays caused by committee vendors/contractors;
- ▣ Failure to know; or
- ▣ Failure to use filing software properly.

- b) Committee may **not** use best efforts defense if failure to report is due to unavailability, inexperience or negligence of staff, counsel or organization, failure of committee's computer system, delays caused by vendors, failure to understand or know the law or failure to use filing software properly.

4. For more information, review:

http://www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-7.pdf
(rules) and

http://www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-13.pdf
(policy statement) and the May and July 2007 *Record* issues.

Best Practices: Filing

- ✓ Ensure your staff and vendors understand filing rules and deadlines
- ✓ Update your software regularly
- ✓ Have a current email address on Form 1 to receive courtesy email reminders

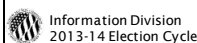
Best Practices:

- Ensure your staff, vendors and counsel understand reporting and filing rules and deadlines.
- Update your software regularly.
- To keep up with filing deadlines, make sure your committee has a current email address on its Form 1 (for receiving courtesy reminders). (To do this, submit a complete electronic Form 1 with a new email address.) Deadlines are also posted online at http://www.fec.gov/info/report_dates.shtml and in the January Record each year.

II. RAD Review Process

Three Branches of RAD

- ▣ Authorized Branch – 13 analysts
 - Review all federal candidate committee reports
 - 2 month training program and mentored for 6-12 months
- ▣ Party Non-Party Branch – 15 analysts
 - Review all Party and PAC reports
 - 4-5 month training program and mentored for 6-12 months
- ▣ Compliance Branch – 4 analysts
 - Implement the Non-Filer and Administrative Fines programs



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A. Organization of RAD

1. Three Branches

- a) Party/Non-Party Branch – reviews all party committee and PAC reports – 20 analysts. New analysts undergo a 4-5 month training process and are then mentored by a more senior analyst for 6 to 12 months.
- b) Authorized Branch – reviews federal candidate committee reports – 15 analysts. New analysts undergo a 2 month training process and are then mentored by a more senior analyst for 6 to 12 months.
- c) Compliance Branch – serves a quality control function for the review branches and implements the Non-filer and Administrative Fine Programs – 4 analysts.
- d) Recently began cross training analysts to review reports filed by all committee/entity types.

PAC/Party Analysts

- ▣ Each analyst is assigned 300-500 committees
- ▣ PACs are assigned randomly
- ▣ Larger PACs assigned to more senior analysts
- ▣ National committees assigned to more senior analysts, State party committees assigned by state, Local parties assigned randomly

2. **Committee Assignments – Party/Non-Party Branch**

- a) Party/Non-Party Branch analysts are assigned anywhere from 200 to 400 committees (parties and PACs).
- b) PACs are assigned randomly with the larger ones being assigned to more senior analysts.
- c) National party committees are assigned to the more senior analysts. State party committees are assigned by state, so that the assigned analyst reviews both the Democratic and Republican state parties. Local party committees are assigned randomly.

Analyst Responsibilities

- ▣ Review assigned committees' reports by established deadlines
- ▣ Assist committees by phone and log calls
- ▣ Meet with committees by request
- ▣ Participate in FEC conferences and roundtables
- ▣ Special projects



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3. Analyst Responsibilities

- a) Review all reports filed by assigned committees by established deadlines.
- b) Customer service role – assist committees on the phone on a daily basis and log phone calls. Meet with committees by request.
- c) Participate in FEC Conferences and Roundtables.
- d) Special Projects.

RAD Review and Referral Policy

- ▣ Categories of review include:
 - Mathematical Discrepancies
 - Failure to Provide Supporting Schedules
 - Failure to Properly Itemize Contributions from Individuals
 - Prohibited, Excessive and Impermissible Contributions
 - Improper Itemization of Disbursements
- ▣ RFAI threshold
- ▣ Thresholds are confidential and policy is approved by the Commission



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B. RAD Review of Reports

1. RAD Review and Referral Policy

- a) Internal policy contains categories of review the analyst checks, such as: Prohibited, Excessive and Impermissible Contributions, Mathematical Discrepancies, Failure to Provide Supporting Schedules and Failure to Properly Itemize Contributions from Individuals and Disbursements, to name a few.
- b) Policy has established thresholds for making determinations on whether to send a Request for Additional Information (RFAI).
- c) Thresholds are confidential and policy is approved by the Commission. A redacted version of the RAD Review and Referral Policy can be found on the RAD web page.

Review of Reports

- ▣ Thresholds are applied on a per report basis.
 - If reoccurring reporting issues exist on multiple reports, a committee may receive multiple RFAIs identifying the same issue.
 - RAD does not consider previous responses to RFAIs.
 - ▣ Exception: Responses relating to best efforts procedures apply for the two year election cycle
- ▣ It's possible to see an issue questioned on one report, but not on another.

- d) Review is conducted on a per report basis, meaning the thresholds are applied to each report reviewed.
 - (1) This means a committee may receive a RFAI which includes the same issue already addressed in response to a RFAI referencing a different report.
 - Exceptions include outlining Best Efforts procedures which would apply to the two-year cycle.
 - (2) There may be several issues that are aggregated together to meet a single threshold, so it's possible to see an issue questioned on one report that isn't included in an RFAI on for another report.
- e) Policy is reassessed every election cycle and revisions/changes made based on input from RAD and other offices (such as OGC), and Commissioners.

Request for Additional Info

- ▣ If internal thresholds are met:
 - Analyst sends RFAI with response due date in upper right corner
- ▣ No extensions
- ▣ Responses assessed by analysts, team leaders
- ▣ Analysts do not reply to committee responses



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C. Request for Additional Information (RFAI)

1. **If internal thresholds are met, an RFAI is sent**, with a Response Due Date in the upper right hand corner of the letter, extensions are not granted. The committee analyst's name and contact telephone number are also provided in the letter.

*Tip: You can find out who your analyst is by visiting:
<http://www.fec.gov/rad/index.shtml>.*

RFAIs via Email

- ▣ RAD is now emailing RFAIs to email address on Form 1 (Statement of Organization).
 - Opt-Out Option: File a Form 99 to request that RFAIs be mailed via USPS.
- ▣ Committees can now disclose up to two email addresses on Form 1.
- ▣ Ensure current contact information (mailing address, email address, and phone number) appear on FEC Form 1.



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2. Committees should ensure that they have provided the most current mailing address, email address and phone numbers on their Statement of Organization (FEC Form 1). Often RFAIs are returned by the Post Office due to an incorrect mailing address.
3. RAD's process for sending RFAIs has changed. Most RFAIs are now sent via email to the Committee's official email address, as disclosed on the Statement of Organization (FEC Form 1). Up to two email addresses can now be provided (both will be used for emailing RFAIs). Committees will have the option to continue to receive RFAIs on paper through the mail.

Request for Additional Info

Link to RFAI

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Request for Additional Info

Response Due Date

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Request for Additional Info

not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1166.

Sincerely,

Bradley Matheson
Bradley Matheson
Senior Campaign Finance Analyst
Reports Analysis Division

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RAD FAQs Web Page

Click here

FEDERAL ELECTION COMMISSION

Reports Analysis Division

Click here to find your Campaign Finance Analyst

REPORTS ANALYSIS DIVISION MISSION STATEMENT

The ultimate mission of the Reports Analysis Division (RAD) is to ensure that campaigns and political committees file timely and accurate reports that fully disclose their financial activities. RAD is responsible for reviewing statements and financial reports filed by political committees participating in federal elections, providing assistance and guidance to the committees to properly file their reports, and for taking appropriate action to ensure compliance with the FEA. By enforcing the rules in a fair and objective manner, RAD fosters the electorate's faith in the ultimate integrity of the nation's political process.

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<http://www.fec.gov/rad/index.shtml>

Responding to RFAs

- ▣ Analysts do not contact committees in every case when a response is not sufficient
- ▣ Committee should contact its analyst before and/or after filing a response
- ▣ Analysts do not make legal conclusions
- ▣ Analysts cannot categorize your activity
- ▣ In some cases, RAD consults OGC before sending an RFAI and when assessing a committee's response



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4. Responses are assessed by the analysts and in some cases, team leaders.

- a) Analysts do not reply to responses.
- b) Contact is not made with committees in every case when a response is not sufficient. Further explanation below.
- c) Committees are encouraged to contact their assigned analyst prior to responding if unsure about how to respond or after a response is filed to ensure an adequate response is received.
- d) Keep in mind that analysts can't make legal conclusions or give guidance on a legal conclusion being made by a committee. In addition, they cannot determine what category your activity falls under (i.e., independent expenditures or coordinated party expenditures).
- e) In some cases, RAD consults with OGC before sending a RFAI and when making a response assessment.

Responding to RFAs

- ▣ File amendment to:

Add, Change or Delete actual entries on FEC report

- ▣ Use miscellaneous text submission (Form 99) for:

Narrative responses that do not affect actual entries within a report

(e.g., demonstrating best efforts)



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5. **Must amend report when changing information that affects entries on a report.** This would include additions, changes or deletions.
6. **Miscellaneous Text Submission (Form 99)**
Used for narrative responses that do not affect actual entries within a report. (For example, when outlining procedures for “Best Efforts” in obtaining contributor information.)

Audit Consideration Factors

- ▣ Level of financial activity
- ▣ Responses to RFAs
 - ✓ Late or no response
 - ✓ Inadequate response
- ▣ Number of amendments filed is NOT a factor
- ▣ Number of RFAs received is NOT a factor if responses were adequate and timely



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D. Referrals to the Audit Division

1. Factors for making referrals to the Audit Division

- a) Level of financial activity;
- b) Responses to RFAs:
 - (1) Late or no response,
 - (2) Inadequate response.

2. The number of amendments filed is not a factor

3. The number of RFAs is not a factor if responded to adequately and on time.

OGC & ADRO Referrals

- ▣ Policy includes referral thresholds
- ▣ RAD calls committee before referring to OGC or ADRO to explain RFAI and request response
- ▣ Adequate and timely response may prevent referral

E. Referrals to OGC (Office of General Counsel) and ADRO (Alternative Dispute Resolution Office)


1. Internal policy includes thresholds for determining whether a matter should be referred to OGC or ADRO.
2. Committee will receive a phone call from RAD prior to a referral to ADRO or OGC to explain RFAI and request a response.
3. An adequate response is required by the timeframe given to prevent the matter from being referred.

III. Common Reporting Errors

Common Math Errors

- ▣ Cash on hand
- ▣ Detailed Summary Page
 - Line totals
 - Column B figures (YTD or ECTD)
- ▣ Amendments

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS		
FEC Form 3X (Rev. 02/2003)	Page 2	
Write or Type Committee Name		
Report Covering the Period: From: 01 / 01 / 2013 To: 06 / 30 / 2013		
	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1,		
(b) Cash on Hand at Beginning of Reporting Period.....	86,753.09	
(c) Total Receipts (from Line 19)		
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		
7. Total Disbursements (from Line 31)		
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)		
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)		

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A. Common Math Errors

1. Cash on Hand

The ending balance of the last report should match the opening balance of the current report.

2. Use the Detailed Summary Page to conduct a quality check for Columns A and B.

- Ensure that each of the “total” lines equals the sum of the lines supporting that total line.
- Do the math to ensure that the Column B figure (Year-To-Date) is correct. Column B from last report + Column A from this report = Column B for this report.

3. Amendments:

Math errors like those mentioned above occur frequently when a committee amends a past report and does not file all subsequent reports. For changes made to an old report, the committee may need to file all subsequent amendments in many cases, including if any contributions or disbursements moved lines, if activity moved to a different report, or if activity is added or removed from that reporting period. A small adjustment on a past report can affect each of the following reports.

Common Schedule Errors

- ❑ Make sure all of the schedules needed are included with the filing.

23. Contributions to
Federal Candidates/Committees
and Other Political Committees.....

\$2,500

Disbursement on
Detailed Summary Page

Supporting Schedule B

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE	OF			
			21b	22	23	24	25	26
			27	28a	28b	29a	29b	30b
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.								
NAME OF COMMITTEE (in full) XYZ PAC								
A. Full Name (Last, First, Middle Initial) Jane Doe for Congress						Date of Disbursement 05 / 11 / 2013		
Mailing Address PO Box 1234								
City Big City						State US		
Zip Code 00000								
Purpose of Disbursement Contribution						Amount of Each Disbursement this Period 2,500.00		
Candidate Name Jane Doe						Category/ Type		
Office sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President						Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State: US District: 1								

B. Common Schedule Errors

1. Include correct schedules.

The Detailed Summary Page gives cues as to which schedules will need to be included with the filing. For example, if the committee has an amount on Line 23, a Schedule B will need to be included in your filing to support the amount on Line 23 of the Detailed Summary Page.

2. Fill out the schedule completely.

If the committee files electronically, it is helpful to look at the report as it appears filled in on the FEC Forms. Add any missing information, including purposes of disbursement or employer and occupation information.

Common Schedule Errors

- ▣ Include all information required by each schedule:
 - Full name of contributor
 - Employer/occupation information
 - Purposes of disbursement
 - Purposes for debts

C. Best Efforts Statements

Best Efforts Statements

- ▣ Can be filed “preemptively” at the beginning of a year or election cycle
- ▣ Be sure your statement:
 - Outlines your committee’s set procedure
 - Includes each of the required steps outlined in the campaign or committee guide
- ▣ Retain detailed records of your follow-up requests (copies of letters, emails, phone logs)

Purpose of Disbursement

Entry must be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment.

Full Name (Last, First, Middle Initial) A. LMN Consulting		Date of Disbursement 02 17 2013	
Address 123 Moneyed Lane		Amount of Each Disbursement this Period 2,500.00	
City, ST 00000		Refund or Disposal of Excess Contributions Required Under 11 C.F.R. 403.50 <input type="checkbox"/>	
Purpose of Disbursement PAC Fundraising Consulting		Category/Type <input type="checkbox"/>	
Candidate Name <input type="checkbox"/>		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) <input type="checkbox"/>	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: <input type="checkbox"/>	District: <input type="checkbox"/>	

D. Purpose of Disbursement

1. FEC regulations require that the “purpose of disbursement” entry for each disbursement be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment. 11 CFR 104.3(b)(3) and (4).

Purpose of Disbursement

- ❑ Rule of thumb: Could reader discern why a payment was made simply by reading the description provided?
- ❑ Non-exhaustive lists for inadequate and adequate examples available online at <http://www.fec.gov/law/policy.shtml#purpose>

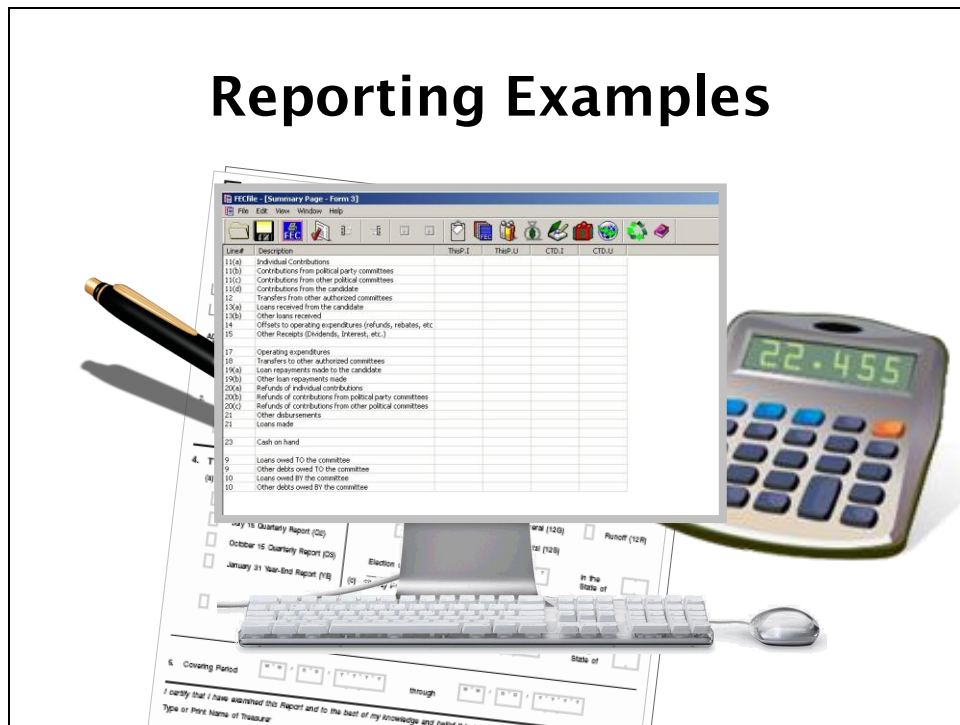


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2. Policy statement includes non-exhaustive lists of acceptable and unacceptable “purpose of disbursement” descriptions intended to provide additional guidance to the regulated community and to foster consistency among filers.
3. As a rule of thumb, the statement suggests that filers consider whether a person unaffiliated with the campaign/committee could discern why a payment was made by reading the description they have provided.
4. Lists are updated periodically and made available online
 - Inadequate examples at <http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf>
 - Adequate examples at <http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf>

IV. Reporting Examples



Contributions Made (PACs & Parties)

- ❑ To Federal Candidates
 - Disclosed on Schedule B supporting Line 23 of Detailed Summary Page
 - Include office sought, state & district (if applicable)
 - Include election designation
- ❑ To Nonfederal Candidates
 - Disclosed on Schedule B supporting Line 29 of Detailed Summary Page

Federal Candidate

Schedule B, Line 23

SCHEDULE B (FEC Form 3X)		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE OF	
ITEMIZED DISBURSEMENTS				<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b			
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.							
NAME OF COMMITTEE (in Full) Baseball Fanatics Political Action Committee							
Full Name (Last, First, Middle Initial) A. Committee to Elect Stephen Strasburg				Date of Disbursement MM / DD / YYYY 01 / 19 / 2013			
Mailing Address 1776 Washington St.							
City Alexandria, VA 22314				State Zip Code			
Purpose of Disbursement Contribution				Category/Type 011			
Candidate Name Stephen Strasburg				Amount of Each Disbursement this Period 5,000.00			
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President				Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
State: VA District: 08				Year: 2014			

- A. Contributions Made (Federal vs. Nonfederal) – PACs and Parties**
- 1. Federal Candidates**
- Disclosed on Schedule B supporting Line 23 of the Detailed Summary Page.
 - Include office sought, state & district (if applicable).
 - Include election designation.

Nonfederal Candidate

Schedule B, Line 29

SCHEDULE B (FEC Form 3X)		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE OF	
ITEMIZED DISBURSEMENTS				<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input checked="" type="checkbox"/> 29 <input type="checkbox"/> 30b			
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.							
NAME OF COMMITTEE (In Full) Baseball Fanatics Political Action Committee							
Full Name (Last, First, Middle Initial) A. Re-Elect Cal Ripken for Governor				Date of Disbursement MM / DD / YYYY 06 / 30 / 2013			
Mailing Address 873 Long Drive							
City Aberdeen, MD 21001				State Zip Code			
Purpose of Disbursement Nonfederal contribution				Category/Type 011		Amount of Each Disbursement this Period 1,000.00	
Candidate Name							
Office Sought:		<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For:			
				<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
State:		District:					

2. Nonfederal Candidates

- Disclosed on Schedule B supporting Line 29 of the Detailed Summary Page.

Returned vs. Refunded

PACs & Parties:

- ☐ Returned, Lost or Voided checks
 - Negative entry on line number where transaction was originally disclosed
- ☐ Refunds
 - Refund check from another committee appears on Schedule A for line 16

B. Voids vs. Refunds – PACs and Parties

1. **Voids or returned/uncashed checks** – should be disclosed as negative entries on the schedule supporting the Detailed Summary Page line number where the transaction was originally disclosed.

Returned, Lost or Voided

Negative Entry, Schedule B, Line 23

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)		PAGE 1 OF 2	
Use separate schedule(s) for each category of the Detailed Summary Page		<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24
		<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 29
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Baseball Fanatics Political Action Committee					
Full Name (Last, First, Middle Initial) Committee to Elect Stephen Strasburg			Date of Disbursement 06 / 02 / 2013		
Mailing Address 1776 Washington St.					
City Alexandria, VA 22314					
Purpose of Disbursement Check uncashed			011		
Candidate Name Stephen Strasburg			Category/Type		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President			Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) Primary 2014		
State: VA District: 08			Amount of Each Disbursement this Period - 5,000.00 Check uncashed See February Monthly		

Refund of Contribution

Schedule A, Line 16

SCHEDULE A (FEC Form 3X)		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 1 OF 1	
ITEMIZED RECEIPTS				<input type="checkbox"/> 11a 13		<input type="checkbox"/> 11b 14	
				<input type="checkbox"/> 11c 15		<input checked="" type="checkbox"/> 12 16	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.							
NAME OF COMMITTEE (In Full) Baseball Fanatics Political Action Committee							
A. Full Name (Last, First, Middle Initial) Susie Slugger for Congress				Date of Receipt 06 / 01 / 2013			
Mailing Address 777 Sunshine Lane				Amount of Each Receipt this Period 500.00			
City Tampa, FL 33614							
FEC ID number of contributing federal political committee: C 00000001							
Name of Employer				Occupation			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)				Aggregate Year-to-Date 500.00			

**Contribution
itemized in March
Monthly**

2. **Refunds** – when a refund check is actually received from another committee and deposited into the federal account, it should be disclosed on Schedule A for Line 16 as a receipt.

Redesignations

- ▣ Use memo entries to note previously reported information – do not add them again to the totals.
- ▣ If redesignated after the close of books, show the redesignation on the next report and indicate the report on which it was previously itemized.
- ▣ Previous report should not be amended.
- ▣ If redesignating for previous election, to retire debts, be sure to note year, debt and election (e.g., 2012 primary debt)



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C. Redesignations of Excessive Contributions (PACs, Parties & Authorized Committees)

1. Use memo entries to note previously reported information – do not add them again to the totals.
2. If redesignated after the close of books, show the redesignation on the next report and indicate the report on which it was previously itemized.
3. Previous report should not be amended.
4. If redesignating for previous election, to retire debts, be sure to note year, debt and election (e.g., 2012 primary debt).

Redesignations: PAC/Party

June Monthly

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 1 OF 2
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 29 <input type="checkbox"/> 30b		
NAME OF COMMITTEE (In Full) Baseball Fanatics Political Action Committee				
Full Name (Last, First, Middle Initial) Committee to Elect Hannah Homerun		Date of Disbursement 05 / 11 / 2013		
Mailing Address 1060 West Addison St.				
City Chicago, IL 60613				
Purpose of Disbursement Contribution		Amount of Each Disbursement this Period 6,000.00		
Candidate Name Harry Homerun		Category/Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2014		
State IL		District		
Full Name (Last, First, Middle Initial) Committee to Elect Hannah Homerun		Date of Disbursement 06 / 22 / 2013		
Mailing Address 1060 West Addison St.				
City Chicago, IL 60613				
Purpose of Disbursement Contribution		Amount of Each Disbursement this Period 1,000.00		
Candidate Name Harry Homerun		Category/Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2014 General		
State IL		District		

Redesignations: PAC/Party

July Monthly

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 1 OF 2
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 29 <input type="checkbox"/> 30b		
NAME OF COMMITTEE (In Full) Baseball Fanatics Political Action Committee				
Full Name (Last, First, Middle Initial) Committee to Elect Hannah Homerun		Date of Disbursement 05 / 11 / 2013		
Mailing Address 1060 West Addison St.				
City Chicago, IL 60613				
Purpose of Disbursement Contribution		Amount of Each Disbursement this Period 6,000.00		
Candidate Name Jenny Piccolo		Category/Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2012 Primary		
State WI		District		
Full Name (Last, First, Middle Initial) Committee to Elect Hannah Homerun		Date of Disbursement 06 / 22 / 2013		
Mailing Address 1060 West Addison St.				
City Chicago, IL 60613				
Purpose of Disbursement Contribution -- Redesignation		Amount of Each Disbursement this Period 1,000.00		
Candidate Name Harry Homerun		Category/Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2014 General		
State IL		District		

Review: IE Definition

Expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate, that is not made in cooperation, consultation, or concert with, or at the request or suggestion of a candidate or his/her agents.

EXPRESS ADVOCACY
NO COORDINATION



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D. Independent Expenditures – Definition

1. Expenditure for communication that "expressly advocates" the election or defeat of a clearly identified candidate and that is not made in cooperation with, or at the suggestion of, the candidate or his/her campaign or its agents, or a political party or its agents.

Disclosure

- ▣ PACs report on Schedule E of Form 3X
- ▣ Date made = Date disseminated
- ▣ Aggregate on per calendar year, per election, per office sought basis

E. Disclosure of Independent Expenditures

- 1. Report using Schedule E/FEC Form 3X during appropriate reporting period.**
- 2. Date Made = Date Disseminated**
 - An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated.
 - See the FEC's interpretive rule at 76 FR 16233 (October 4, 2011) (online at http://www.fec.gov/law/cfr/ej_compilation/2011/notice_2011-13.pdf).
- 3. Aggregation**
Done on a per calendar year, per election, per office sought (race) basis.
- 4. Additional reporting on 48- and 24-hour basis:**

Disclosure

48-Hour Reports

- ☐ Required for IEs
 - Aggregating ≥ \$10,000
 - Made 20 days or more before an election

24-Hour Reports

- ☐ Required for IEs
 - Aggregating ≥ \$1,000 made
 - < 20 days but more than 24 hours before an election

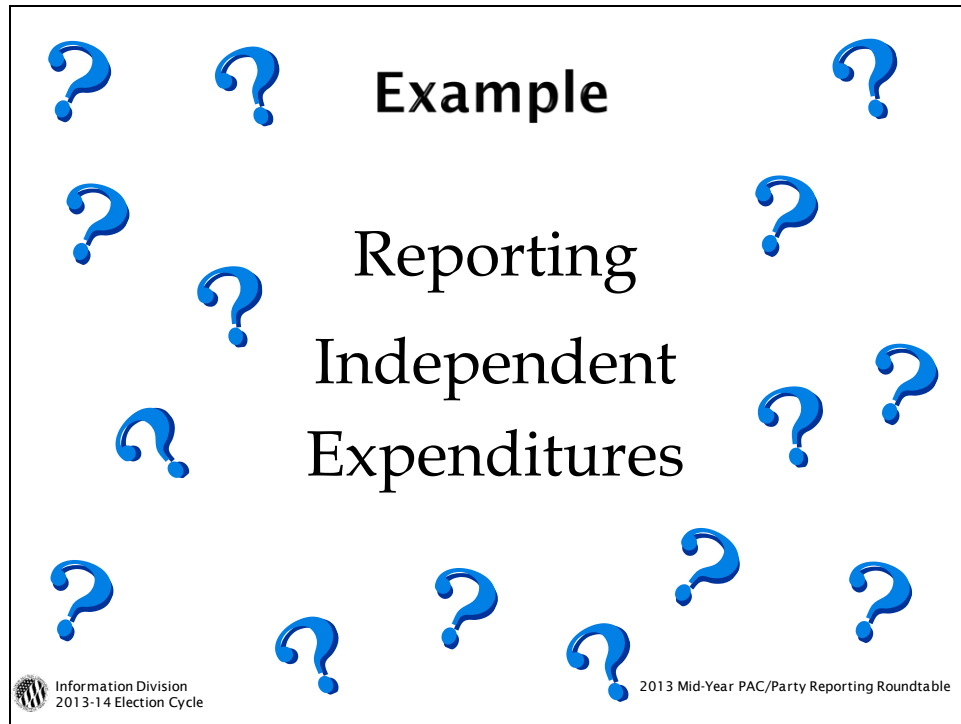
****Disclose again on next regular report****



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- **48-Hour Reporting (11 CFR 104.5(g)(1))**
 - Must file a **48-Hour Report** for independent expenditures that aggregate \$10,000 or more, anytime during a calendar year up to and including the 20th day before an election.
 - A 48-Hour Report is required each time an additional \$10,000 is aggregated in independent expenditures.
- **24-Hour Reporting (11 CFR 104.5(g)(2))**
 - Must file a **24-Hour Report** for independent expenditures aggregating \$1,000 or more made less than 20 days but more than 24 hours before the day of an election.
 - A 24-Hour Report is required each time an additional \$1,000 is aggregated in independent expenditures.
- **48- and 24-Hour Report** is filed using stand-alone Schedule E; check appropriate box to note type of report.
- **48- and 24-Hour Report time frames** for each state are located on our website:
 - **2012:** http://www.fec.gov/info/charts_ie_dates_2012.shtml.
 - **2013:** http://www.fec.gov/info/charts_ie_dates_2013.shtml.



F. Reporting Example: Large Last-Minute Independent Expenditures

House candidate Arthur Fonzarelli wouldn't accept PAC checks and his campaign would not speak to representatives of the Union of Auto Mechanic Instructors PAC. However, the PAC still wanted to lend its support to candidate Fonzarelli. On October 27, 2014, just before the November 4 general election, the Union of Auto Mechanic Instructors PAC runs a \$7,500 radio ad on WBQW-FM supporting Fonzarelli. The bill for the ads was paid on November 27, 2014.

- 1. What type of transaction is this?**
- 2. How must the committee disclose the transaction(s)?**
- 3. What information from the scenario do we need to disclose this correctly?**

Reporting Example Answer Key: Large Last-Minute Independent Expenditures

1. What type of transaction is this?

PAC/Party Reporting Independent Expenditures

Last-Minute Reporting

- ▣ What type of transaction is this?

Answer: Last-minute independent expenditure

- ▣ How must the committee disclose the transaction(s)?

Answer: 24-hour report, then on post-general

- ▣ What information from the scenario do we need to disclose this correctly?

- ▣ Tricky Issues?



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The PAC is making an independent expenditure, defined as an expenditure for a communication that “expressly advocates” the election or defeat of a clearly identified candidate and that is not made in cooperation with, or at the request or suggestion of, a candidate or his/her campaign or its agents, or a political party committee or its agents.

2. **How must the committee disclose the transaction(s)?**

An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated. If it aggregates \$1,000 or more and is made less than 20 days but more than 24 hours before the day of an election, as this expenditure did, the PAC must file a 24-Hour Report on Schedule E disclosing the independent expenditure. The PAC must disclose the independent expenditure again, on Schedule E, for the next regular FEC report (30-Day Post General Report).

24-Hour IE Report

Initial Reporting – 24-hour Schedule E

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE **1** OF
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Union of Auto Mechanic Instructors PAC			FEC IDENTIFICATION NUMBER C 00000004	
Check: <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report			<input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	
Full Name (Last, First, Middle Initial) of Payee WBQW-FM		Date 10 / 27 / 2014		
Mailing Address 12100 West Howard Avenue		Amount 7,500.00		
City Greenfield	State WI	Zip Code 53228		
Purpose of Expenditure Radio Ad		Category/Type 004		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President
Name of Federal Candidate Supported or Opposed by Expenditure: Arthur Fonzarelli		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose		
Calendar Year-To-Date Per Election for Office Sought 7,500.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		

Reporting example continues on next page

3. What information from the scenario do we need to disclose this correctly?

Answer: Key facts in the scenario include the date of dissemination (10/27/14), the fact that it is an advertisement that contained express advocacy, and was not coordinated with the campaign. The PAC will also need to disclose the payee's name and address, the candidate information, the purpose of the expenditure, the amount and the calendar year-to-date per election for the office sought.

On the next report filed (30 Day Post-General covering 10/16/14-11/24/14, and due on 12/4/14), the PAC must report the same information disclosed on the 24-Hour Notice on Schedule E as a MEMO entry because the payment has not been made yet. Accordingly, the PAC must report a debt on Schedule D to "WBQW-FM" until it is settled.

IE Disclosed
(Post-General)

Disclosure on Next Regular Report

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE **1** OF **1**
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Union of Auto Mechanic Instructors PAC			FEC IDENTIFICATION NUMBER C 00000004	
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input type="checkbox"/> New report <input type="checkbox"/> Amends report filed on				
Full Name (Last, First, Middle Initial) of Payee WBQW-FM		Date 10 / 27 / 2014		
Mailing Address 12100 West Howard Avenue		Amount MEMO 7,500.00		
City Greenfield	State WI	Zip Code 53328		
Purpose of Expenditure Radio Ad		Category/Type 004	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WI District: 4	
Name of Federal Candidate Supported or Opposed by Expenditure: Arthur Fonzarelli			Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Calendar Year-To-Date Per Election for Office Sought		7,500.00 Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		

Reporting example continues on next page

Debt Owed
(Post-General)

Other Reporting - Debt

SCHEDULE D (FEC Form 3X)

DEBTS AND OBLIGATIONS

Excluding Loans

(Use separate schedule(s) for each numbered line)

PAGE **1** OF **1**
 FOR LINE NUMBER: (check only one)
☐ 9
☒ **10**

NAME OF COMMITTEE (In Full)

Union of Auto Mechanic Instructors PAC

<p>A. Full Name (Last, First, Middle Initial) of Debtor or Creditor</p> <p style="text-align: center;">WBQW-FM</p> <p>Mailing Address</p> <p style="text-align: center;">12100 West Howard Avenue</p> <p>City State Zip Code</p> <p style="text-align: center;">Milwaukee WI 53328</p>	<p>Nature of Debt (Purpose):</p> <p style="text-align: center;">Radio Ad for Arthur Fonzarelli</p>	
<p>Outstanding Balance Beginning This Period</p> <div style="border: 1px solid black; text-align: center; padding: 2px;">0.00</div>		
<p>Amount Incurred This Period</p> <div style="border: 1px solid black; text-align: center; padding: 2px;">7,500.00</div>	<p>Payment This Period</p> <div style="border: 1px solid black; text-align: center; padding: 2px;">0.00</div>	<p>Outstanding Balance at Close of This Period</p> <div style="border: 1px solid black; text-align: center; padding: 2px;">7,500.00</div>

When full payment is made to the vendor on 11/27/14, it should be reflected on Schedule E supporting Line 24, as well as Schedule D supporting Line 10 of the Year End Report (coverage period: 11/25/14-12/31/14).

Reporting example continues on next page

IE Payment
(Year-End)

Subsequent Payment

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE **1** OF **1**
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Union of Auto Mechanic Instructors PAC		FEC IDENTIFICATION NUMBER C 00000004	
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input type="checkbox"/> New report <input type="checkbox"/> Amends report filed on MM / DD / YYYY			
Full Name (Last, First, Middle Initial) of Payee WBQW-FM		Date 11 / 27 / 2014	
Mailing Address 12100 West Howard Avenue		Amount 7,500.00	
City Greenfield	State WI	Zip Code 53328	
Purpose of Expenditure Radio Ad disseminated on 10/27/14		Category/Type 004	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WI District: 4
Name of Federal Candidate Supported or Opposed by Expenditure: Arthur Fonzarelli		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Calendar Year-To-Date Per Election for Office Sought 7,500.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	

Reporting example continues on next page

Debt to Vendor
(Year-End)

Paying Off Debt

SCHEDULE D (FEC Form 3X)

DEBTS AND OBLIGATIONS

Excluding Loans

(Use separate schedule(s) for each numbered line)

PAGE **1**
 FOR LINE NUMBER: (check only one) ☐ 9 ☒ 10

NAME OF COMMITTEE (In Full)

Union of Auto Mechanic Instructors PAC

<p>A. Full Name (Last, First, Middle Initial) of Debtor or Creditor</p> <p style="text-align: center;">WBQW-FM</p>	<p>Nature of Debt (Purpose):</p> <p style="text-align: center;">Radio Ad for Arthur Fonzarelli</p>
<p>Mailing Address</p> <p style="text-align: center;">12100 West Howard Avenue</p>	
<p>City State Zip Code</p> <p style="text-align: center;">Milwaukee WI 53328</p>	

Outstanding Balance Beginning This Period

7,500.00

Amount Incurred This Period

0.00

Payment This Period

7,500.00

Outstanding Balance at Close of This Period

0.00

4. Tricky Issues:

a) Debts

- Debts include ads that are contracted for but not paid for
- When payment for ad is made in subsequent reporting period, report payment on Schedule E, and include date of dissemination in purpose field.
- Update Schedule D with payment; cross-reference Schedule E.

b) 24-Hour Reporting

- Must file a **24-Hour Report** for independent expenditures aggregating (per calendar year, per election, per office) \$1,000 or more made less than 20 days but more than 24 hours before the day of an election.
- Aggregation is done on per calendar year, per election, per office sought (race) basis.
- Use Schedule E on Form 3X – check “24-hour” box.
- Must be received by FEC within 24 hours after the independent expenditure is publicly distributed or otherwise publicly disseminated.
- Must be certified (signed) by treasurer (e-filers should type the treasurers name following the certification on the report).
- For paper filers, can use overnight delivery, hand-delivery or fax to 202-219-0174 (certified or registered mail date will not be considered filed date for these).

- Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
- A 24-Hour Report is required each time an additional \$1,000 is aggregated in independent expenditures.
- The 24-Hour Report time frames for each 2013 Special Election are located on our web site at http://www.fec.gov/info/charts_ie_dates_2013.shtml.

c) 48-Hour Reporting

- In addition, must file a **48-Hour Report** for independent expenditures that aggregate \$10,000 or more, anytime during a calendar year up to and including the 20th day before an election.
- Use Schedule E on Form 3X – check “48-hour” box.
- Must be received by FEC within 48 hours after expenditure is publicly distributed or otherwise publicly disseminated.
- Must be certified (signed) by treasurer (e-filers should type the treasurer’s name following the certification on the Report).
- For paper filers, can use overnight delivery, hand-delivery or fax to 202-219-0174 (certified or registered mail date will not be considered filed date for these).
- Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
- Aggregation is done on a per calendar year, per election, per office sought (race) basis.
- A 48-Hour Report is required each time an additional \$10,000 is aggregated in independent expenditures.

Avoid Common Mistakes

- ▣ Check for math errors
- ▣ Include all appropriate schedules, with all information
- ▣ Provide all information required by schedule
- ▣ Consult form instructions available on our website
- ▣ Designate contributions
- ▣ Only enter contributors into reporting software once to avoid aggregation problems
- ▣ Ensure correct committee name disclosed for contributions made/received



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G. Avoiding Common Errors

1. Check for math errors.
2. Include all appropriate schedules.
3. Provide all information required by schedule. Consult form instructions available on our web site at <http://www.fec.gov/info/forms.shtml>.
4. Designate all contributions made to Federal candidate committees. If not designated, contribution is applied towards next election and may result in excessive contribution. Also indicate year of election and check Primary or General. For Special, Runoff, Convention or Recount election, check "Other" and also include election type and year (e.g., "Special General 2013").
5. Avoid accidentally entering contributors multiple times into the committee's reporting software program. This causes aggregation problems as well as excessive contributions to be reported.
6. Ensure the correct committee name is disclosed for contributions made. Using an incorrect committee name creates data entry problems and errors on the public record.

Best Practices: Reporting

- ✓ Respond completely to all RFAs by the deadline specified
- ✓ Contact your analyst to clarify questions and issues! Please contact the analyst if you are not sure what is wrong. The analyst can assist prior to the report being amended.
- ✓ Consult the most recent copy of “inadequate purpose” list
- ✓ Make sure all purposes of disbursements disclosed are on the “acceptable” list or would meet the rule of thumb



Information Division
2013-14 Election Cycle

2013 Mid-Year PAC/Party Reporting Roundtable

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Objectives

- ▣ Review filing deadlines and application of “best efforts” for timely filing
- ▣ Learn about the Reports Analysis Division (RAD) review process and how best to respond to a Request for Additional Information (RAI)
- ▣ Discuss common reporting errors

Workshop Evaluation

Help Us Help You!

Please complete an evaluation
of this workshop.